Planning Inspectorate

White Horse Reservoir (previously South East Strategic Reservoir Option) – WA010005

Section 51 Advice Log
Version: 16 November 2026

This document comprises a record of the s51 advice that has been given by the Planning Inspectorate to the applicant (Thames Water Utilities Limited) during the pre-application stage. It will be updated by the Planning Inspectorate after every interaction with the applicant within which s51 advice has been given.

The applicant will always be given the opportunity to comment on the Planning Inspectorate's draft record of the s51 advice given before it is published on the relevant project page on the Find a National Infrastructure Project website.

The role of the advice log at the acceptance stage

Section 55(4) of the PA2008 requires the Planning Inspectorate to consider, amongst other things, the extent to which the applicant has had regard to the s51 advice given by the Planning Inspectorate in connection with the application when deciding if the application can be accepted for examination. Section 51 advice includes:

- advice given about applying for an order granting development consent
- advice given about making representations about an application for an order granting development consent

The applicant will use this advice log as the tool for demonstrating:

- regard to the s51 advice given to the applicant by the Planning Inspectorate
- regard to any s51 advice given to others by the Planning Inspectorate

The applicant will submit a final version of this advice log which demonstrates regard to all s51 given by the Planning Inspectorate at the pre-application stage as part of the application.

White Horse Reservoir – Applicant meeting index	
Date of meeting	**Meeting overview**
31 October 2024	This advice was sent by email only for feedback on the Programme document.
2 April 2025	A Project Update Meeting (PUM) was held where various advice was provided on the following agenda items. Project Scope and Programme Document • DCO Documents and Consultation • Engagement and Masterplan • PINS Issue Tracker • General advice and Follow-up The advice can be seen in detail below.
13 October 2025	A Project Update Meeting (PUM) was held where various advice was provided on the following agenda items. • Statutory Consultation • Update on PEIR Findings • Issues Tracker • Programme Lookahead The advice can be seen in detail below.
29 October 2025	This advice was sent by email only for updates on the pre-application services
26 March 2026	A Project Update Meeting (PUM) was held where various advice was provided on the following agenda items. • Response to Previous PINS Comments • External Scheme Elements as part of the DCO • Issues Tracker • Lands and Rights Negotiations Tracker • Programme Lookahead The advice can be seen in detail below.
09 April 2026	Post-PUM Advice

08 July 2026	A Project Update Meeting (PUM) was held where various advice was provided on the following agenda items. • Additional Consultation • Survey Data • Reservoir Safety- • Issues Tracker and Land & Rights Negotiations Tracker • Programme Lookahead & AOB
31 July 2026	Draft document review feedback
18 September 2026	Email advice to applicant around submission process.
29 September 2026	A Project Update Meeting (PUM) was held where various advice was provided on the following agenda items. • Draft DCO Documents • DCO Submission Arrangements • Issues Tracker and PMIEs • Programme Lookahead & AOB

White Horse Reservoir – Log of s51 given to the applicant		
Advice date: 31 October 2024		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Feedback on Programme document	Following a review of the submitted Programme/Supporting Document (attached) please see the advice below: • Good demonstration of compliance with the Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects Guidance. The Applicant will be aware that one of the mandatory components of the new pre-application service (for all service tiers), as set out in the Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, is demonstrating regard to advice. As such this should be clearly reflected in the application documents. • The Applicant must ensure that the Programme Document (PD) is hosted and maintained on the Applicant's	

	website and share with Local Authorities, Statutory consultees etc. • Please add any targeted consultation dates to Programme Document. (If any) • It would be helpful if the timeframes for the submission of the Adequacy of Consultation Milestone (AOCM), draft document review are added to the Programme document. • An Issues Tracker should be maintained and shared with Local Authorities, Statutory consultees etc. • It would be helpful if the PD could provide approximate timescales for future project update meetings with the Inspectorate. It would also be helpful to list any meetings with key stakeholders to enable those parties to deploy resources effectively (see below as outline advice). For further guidance of the Pre-Application process including what the programme document should contain I refer you to the following link: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects - GOV.UK	

	As this project will be advancing through The Standard service tier the Planning Inspectorate can provide up to 6 Project update meetings per annum, and it would be useful if potential timings were provided in the Programme document, to effectively resource in advance. The key milestones are outlined below (if not already undertaken) - • *Inception Meeting* • *Post-Scoping, pre-section 42 consultation meeting* • Post-section 42 consultation • Draft documents feedback meeting • Pre-Adequacy of Consultation Milestone Pre-submission meeting	
Meeting date: 02 April 2025		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Project Scope and Programme Document	• The **rationale** for submitting the **s35 direction** should be made clear in statutory consultation documentation. • The **Programme Document** should:	

	○ Include a 6-week feedback period for draft DCO application documents to be reviewed by the Inspectorate. ○ Include the **Adequacy of Consultation Milestone (AoCM)** 3 months before submission. ○ Be updated and submitted to the Inspectorate **at least 2 weeks prior** to future meetings, if any updates/amendments. ○ Include a **high-level overview of unresolved vs. resolved issues** for clarity during Examination.	
DCO Documents and Consultation	• As there are not previous examples of submitted Recreational Amenities Statements for the applicant to review, the Inspectorate advised the following regarding the **Recreational Amenities Statement**: ○ The applicant should seek **legal advice** on the Recreational Amenities Statement to ensure the	

	appropriate information is provided. ○ If beneficial to the applicant, the Inspectorate can **review a draft** and **provide feedback** in the future. ○ The applicant should consult with **local authorities and statutory bodies** on **construction hours**. ○ The Recreational Amenities Statement would be expected to document the **types of recreational amenities** to be provided, the **range of activities** which may be taking place, the **management and maintenance mechanisms**, **risk assessment**, **funding**, as well as any **input required from relevant regulators**. The Inspectorate acknowledges the applicant feels they have received overarching support for the proposed programme, including consultation periods.	

Engagement and Masterplan	• The applicant should ensure engagement with **smaller local wildlife and bird watching groups,** in addition to organisations such as the Environment Agency and Natural England. • The **impacts on local access routes** should be clearly addressed, and the applicant should continue to engage with the local community on rerouting. The proposed timing and periods (14 weeks from Q4 2025 to Q1 2026) for Statutory Consultation are considered acceptable.	
PINS Issue Tracker	• The applicant was advised to **track all issues**, regardless of how major or minor they may determine them to be. This will assist with maintaining a strong record of what has been resolved and what is still to be resolve, which is helpful for traceability during Examination, if the project is accepted for Examination. • The applicant can use **Excel for their internal tracking of the PINS issues tracker** if this is beneficial for them, however **final submissions**	

	must be Word-compatible as Excel files cannot be accepted. • The applicant's proposed minor changes to the Issues Tracker template provided by the Inspectorate are considered acceptable. • It would be appropriate for the applicant to share the issue tracker **before and after** statutory consultation.	
General advice and Follow-up	• The Inspectorate will contact the applicant following the Project Update Meeting to **provide more advice on what should be included in the Recreational Amenities Statement.** • The applicant should be aware of **overlapping NSIP consultations** during the statutory consultation window. • The Inspectorate will **provide feedback on the Programme Document separately**. • The applicant proposed a site tour for the Inspectorate which could coincide with a future update meeting. The Inspectorate acknowledged benefits	

	but advised that it could not commit to this, at this time.	
Meeting date: 13 August 2025		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Response to Previous Comments	• The Inspectorate requested that the updated version of the Programme Document is provided to the Inspectorate before it's published on the applicant's project page. The Inspectorate advised that the Recreational Statement is something expected to be submitted with the application, even if it's within a "Legacy document".	
Update on Project Scope	• The applicant explained that it is proposing floating solar on the reservoir and off-site solar (treated as associated development) to replace a solar farm that would be removed in order to locate the proposed development. • The Inspectorate advised that floating solar is a relatively new concept. As such the applicant should be clear	

	regarding any novel impacts and effects and the approach to assessment in the ES. • The Inspectorate advised that the applicant should set out how elements not previously detailed in the scoping (such as the proposed solar and proposed agriculture) have been further scoped to ensure all potential likely significant effects are reported in the ES. • The Inspectorate highlighted the importance of consistency in diagrams when consulting members of the public, especially using plans of the same land but at different scales. The applicant explained some alterations to the scope of the EIA on the basis of the draft information in the PEIR and following surveys	
Sensitive Information	Sensitive information and the potential for closed hearings, if the application is accepted for Examination, can be discussed at a future meeting.	
HRA	The HRA will not be consulted on as part of the statutory consultation, and the applicant	

	anticipates that all impacts can be screened out of appropriate assessment	
Approach to the PEI Report (PEIR)	The Inspectorate advised that whatever tools have been used to populate application documents should be communicated clearly to ensure transparency. This includes any use of AI.	
Appendix 1	Appendix 1 has been reviewed; the listed documents appear to meet the requirements of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 subject to any change at application.	
Inspection of the site	The Inspectorate agreed that a site inspection would be beneficial but should be conducted following the Statutory Consultation. There would also be benefit for additional Planning Inspectorate attendees, if this is feasible. An appropriate date may be from March 2026 onwards with a discussion in the October 2025 meeting as to which aspects of the site would be beneficial to inspect.	
Programme Lookahead	The Inspectorate requested a more specific date in June 2026 for a Draft Document review to be undertaken by the Inspectorate.	

	A comprehensive list is provided in the prospectus as to which documents should be provided for review.	
Meeting date: 13 October 2025		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Statutory Consultation	• Between April and July 2025, there was extensive engagement between the applicant and local authorities as part of the statement of community consultation (SoCC) process. The applicant shared early draft versions of the SoCC to proactively identify and address any key issues or concerns. • Statutory consultation on the SoCC was undertaken from 18 August to 17 September 2025. This involved host local authorities and was shared with adjacent authorities for information purposes. Statutory consultation is scheduled to run from 28 October 2025 to 13 January 2026. A comprehensive outreach strategy has been implemented to maximise awareness and participation. This includes the	

	distribution of consultation postcards to approximately 75,000 addresses, extending up to 5km beyond the boundary of the draft order limits. Promotional efforts have also included targeted social media advertising, placements in local newspapers and visibility at key transport hubs such as train stations.	
Update on PEIR Findings	The Planning Inspectorate (the Inspectorate) raised a query regarding whether the decommissioning of the floating solar infrastructure is being considered within the scope of the proposed development. It was noted that there remains uncertainty around whether solar panels would be replaced incrementally or decommissioned entirely at the end of their operational lifespan. The Inspectorate advised that it may be beneficial to review decommissioning discussions in recent solar NSIP cases to understand how such matters have been addressed.	
Issues Tracker	• Some of main issues raised by consultees during the consultation and engagement process included reservoir safety, flood risk management, species relocation strategies, the potential impact on the setting of the North Wessex Downs	

	National landscape (NWDNL), the proposed rail solution, and broader transport-related impacts. • The Inspectorate advised that unresolved issues at the acceptance stage may carry over into the examination phase. In response, the applicant confirmed that proactive steps are being taken to manage this risk, including ongoing collaboration with relevant organisations through a series of technical liaison groups. Broader engagement is also planned as part of the preliminary environmental information report (PEIR) process to ensure key matters are addressed early. The Inspectorate advised that it would be acceptable for the Issues Tracker to be issued in Excel format.	
Programme Lookahead	• The Inspectorate advised that in addition to a project update meeting (PUM) before the end of the year a PUM may be beneficial towards the end of January 2026, shortly after the close of the statutory consultation period. This timing would allow the applicant to review and assess all	

	consultation responses received. The Inspectorate also raised concerns regarding the timeline for submission of draft DCO documents for review by the Inspectorate, noting that draft documents are expected in March 2026, which is a considerable gap before the final DCO submission. It advised that any draft documents shared should be as complete as possible, including schedules and appendices, to enable the Inspectorate to align suitable administrative and Inspector resource to provide more substantive and constructive feedback.	
Post Project Update Meeting (PUM) Advice	Following review of the PEIR summary slides, the Inspectorate notes the following: The mitigation slides do not include discussion on the management of flood risk, and it is not identified in the water environment as a key issue/risk. Secured mitigation in relation to flood risk, including appropriate climate change projections will need to have sufficient detail to give confidence that any design or additional measures mitigate potential flood risk during all stages of the proposed development. It should be clearly cross referenced within all relevant chapters.	

Date: 29 October 2025		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Email on Pre-Application Services Update	**IMPORTANT INFORMATION ABOUT UPDATES TO OUR PRE-APPLICATION SERVICES** Following a 6-month review of our services, our Pre-application Prospectus has been updated: 2024 Pre-application Prospectus. The update log at the bottom of the page summarises the changes and clarifications that have been applied. As an applicant with a live project at the pre-application stage of the process, please familiarise yourself with the update and consider how it might affect your pre-application programme and interaction with our services. Please note in particular: • the establishment of land and rights negotiations tracking as a primary service feature – this means it is now expected for **all applicants** to develop and share a land and right negotiations tracker in 1 of 2 available templates,	

	irrespective of the service tier they have subscribed to • clarified expectations of applicants when preparing to interact with the Inspectorate at meetings – including clarified rights for the Inspectorate to delay or refuse service where pre-meeting expectations are not upheld e.g. an updated programme document or issues tracker is not provided, on time, to inform a meeting agenda This communication has been recorded as section 51 advice in the project's advice log. Please provide any questions you have about the service update by response.	
Meeting date: 26 March 2026		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Response to Previous PINS Comments	• The Inspectorate advised that the applicant should ensure that the draft documents include the additional statements required for reservoir projects under the relevant national	

	policy statement (NPS). It noted that this would be the first reservoir Nationally Significant Infrastructure Project (NSIP) considered by the Inspectorate and confirmed that it would be willing to review the draft Recreational Amenities Statement, as part of the draft document process, including any other required "statements" outlined within the NPS. • The Inspectorate advised that the applicant should submit one consolidated package of draft documents, rather than sharing documents in stages. It explained that a single submission enables it to plan administrative resource for the six-week review period. If parts of the submission, such as chapter 2 of the Environmental Statement (ES), are provided later within that period, this shortens the time available for review and complicates resource allocation. • The Inspectorate asked whether the habitats regulations assessment (HRA) screening report would be included in the draft documents. The Inspectorate advised that it would be helpful to understand the applicant's intention, and to have clarity on the	

	status of discussions with Natural England, including any areas of agreement or issues that have been identified. It was agreed that the Applicant would provide PINS with details of the programme for draft DCO documents following the meeting, including whether a staged submission might be required.	
External Scheme Elements as part of the DCO	• The Inspectorate advised the applicant to revisit section 115 of the Planning Act 2008, which defines 'associated development' as development which is associated to the principal development. The guidance[1] on associated development sets out four key principles, that the applicant is advised to review. The Inspectorate noted that as per principle 1 outlined within the guidance, associated development should support the construction or operation of the principal development or help address its impacts. It suggested reviewing questions raised by examining authorities in other NSIPs	

[1] N.B – Guidance published in 2013 and subject to review and update.

	to understand the principles applied when determining whether elements constituted associated development. • The Inspectorate advised that if the applicant intends to include necessary elements of the Severn to Thames Transfer (STT) within the dDCO, it would be necessary for the Examining Authority (ExA) to consider whether it qualifies as associated development. The Inspectorate noted that STT is included in the published Water Resources Management Plan as requiring continued scheme development alongside White Horse Reservoir in case future demand is very high. Justification will therefore be required as to why inclusion of identified elements of STT in the White Horse Reservoir DCO is required. • The Inspectorate asked whether any additional compulsory acquisition (CA) land would be needed in the event that the Swindon and Oxfordshire (SWOX) upgrade works proceed. Presently the information made available to Inspectorate doesn't address the key principles	

	within the guidance or demonstrate the need case for CA. The Inspectorate advised the applicant to ensure that all proposed CA is based on a demonstrable and immediate need, rather than a potential future requirement. In response, the Applicant noted that no additional land acquisition is required for any of the external elements proposed to be included in the DCO. The Inspectorate advised that when the draft Development Consent Order is submitted for review, the inclusion of all associated development would enable it to provide more detailed and constructive feedback. A complete dDCO would help it understand how the associated development integrates with the plans and would make the review more beneficial for the applicant.	
Issues Tracker	• The Inspectorate advised that it is acceptable for issues within the issues tracker to move from green to amber. It noted that the key requirement is for the applicant to identify the current position on each matter and indicate when resolution is anticipated. It also advised that the	

	applicant should aim to progress as many matters to green as possible before the examination or preferably prior to submission of the application documents, where possible. The Inspectorate noted that the position of Network Rail in the issues tracker stood out. It highlighted that the NPS for water resources identifies particularly within the traffic and transport section, that during construction applicants should consider transport via rail and water-bore as a preference over road. It advised the applicant to ensure that, when submitting the application, it clearly demonstrates that all transport options have been considered and that rail and/or water-bore had been considered as the preferred option prior to the consideration of road if possible.	
Lands and Rights Negotiations Tracker	• The Inspectorate advised that when submitting the draft documents, the applicant should provide a complete land rights tracker with all columns filled in. It requested that the tracker includes examples of land plan and works plan reference numbers to support clarity and cross-referencing.	

	• The Inspectorate advised that within the Book of Reference (BoR), the applicant should clearly set out where CA or rights over land are sought. It advised the applicant to ensure that the description of each right is clearly distinguished, that the relevant plot numbers are included, and that these plot numbers align with the rights being applied for. The Inspectorate advised the applicant to secure agreement in relation to Crown land at the earliest opportunity. It noted that unresolved matters concerning Crown land may lead to additional time being required during, or following, the examination.	
Programme Lookahead	• The applicant indicated that it is aiming to submit the application for acceptance in November 2026. The Inspectorate advised the applicant not to submit the dDCO during, or close to, the Christmas period. It explained that local authorities are required to respond to the applicant's consultation, and staff absence over the holiday period may delay or affect the quality of those responses.	

Date: 09 April 2026		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Post-PUM Advice	The applicant is minded to review the East Anglia 1 Offshore Windfarm (EA1) Recommendation Report (RR), where the principles issue in relation to associated development from the application (para 4.6) was whether the additional ducts proposed for future offshore wind farms could be considered associated development under s115 of PA2008 (RR para 4.6 to 4.17). In relation to core principles (i) and (iv), the panel and Secretary of State accepted that applicant's argument during the examination stage for the EA1 in 2014 that the laying of additional ducting (for two planned future projects) was development 'associated with' the EA1 because it **would help address its cumulative impacts.** The applicant is encouraged to review the panels written questions (ExQ1) during the examination for North Falls Offshore Windfarm (decision has not yet been issued) and the applicants response thereto ExQ1, section 6 – Compulsory Acquisition, which is in the public domain. In response to ExQ1 6.1.3 and 6.1.4, the applicant provides further justification for the exercise of	

	compulsory acquisition (CA) powers in relation to those works which are required for the proposed Five Estuaries (VEOWF) project and explains why this would satisfy the condition in s122(2)(a) PA2008 in respect of the land required for that development over which powers of CA are sought. In summary the applicant submitted that the following was relevant: • The timing of VEOWF and the Proposed Development reflects a shared ambition for each project to be operational by 2030; • the two projects are promoted by separate legal entities but there are clear relationships between them; • the public interest benefits of the Shared Works include the further reduction of overall land take and adverse cumulative environment effects; and • NPS policy and related guidance reflects the urgent need for new electricity generating capacity and establishes a policy expectation for undertakers of individual projects to collaborate and co-ordinate with other major infrastructure projects in close proximity or where there are direct overlaps between projects. The White Horse Reservoir applicant is minded, that although for a different type of development to offshore windfarms, it would	

	be advisable to consider to respond to the principles in a similar manner outlined above. If CA powers are sought this would also satisfy the condition in s122(2)(a) PA2008 in respect of the land required for that development over which powers of CA are sought.	
Meeting date: 08 July 2026		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Additional Consultation	• The Inspectorate advised the applicant to review the updated Planning Inspectorate guidance on pre-application consultation and to use this to inform the most appropriate approach to any further consultation activity. It noted that, depending on the nature and extent of any changes, a targeted or supplementary consultation may represent a proportionate approach. The Inspectorate advised the applicant to consider the potential for consultation fatigue amongst stakeholders and local communities when determining its consultation strategy. It noted that undertaking a further full consultation	

	exercise may result in reduced levels of engagement or participation.	
Survey Data	Whilst the Inspectorate notes and accepts that the further survey data is only anticipated to validate and refine the information proposed to be submitted for acceptance for the EIA, the Inspectorate advised that due consideration should be given to the DCO application acceptance process and its requirements. Appropriate information should be submitted in line with the Environmental Impact Assessment Regulations so that the application may be adequately examined.	
Reservoir Safety	The Inspectorate questioned whether further discussions with the Environment Agency had lead to agreement on proposed approaches to the assessment of reservoir safety. WHR team advised that discussions continue to progress. It noted that, with reference to its Scoping Opinion, it may become a matter for questions during examination.	
Issues Tracker and Land & Rights Negotiation Tracker	The Inspectorate advised the applicant to clearly evidence the application of the mitigation hierarchy throughout the Environmental Impact Assessment. It noted that the assessment should demonstrate	

	that all reasonable opportunities to avoid, reduce and mitigate environmental impacts have been exhausted before any residual significant effects are identified.	
Programme Lookahead & AOB	The applicant indicated that it continues to aim to submit the application for acceptance in November 2026 and will require a project update meeting in advance of submission.	
Additional Consultation	• The Inspectorate advised the applicant to review the updated Planning Inspectorate guidance on pre-application consultation and to use this to inform the most appropriate approach to any further consultation activity. It noted that, depending on the nature and extent of any changes, a targeted or supplementary consultation may represent a proportionate approach. The Inspectorate advised the applicant to consider the potential for consultation fatigue amongst stakeholders and local communities when determining its consultation strategy. It noted that undertaking a further full consultation exercise may result in reduced levels of engagement or participation.	

Advice date: 16 July 2026		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Advice in relation to amendments to the Planning Act 2008 (PA2008)	In light of the amended legal framework which will be introduced from 24 July 2026 by the Planning and Infrastructure Act 2025, the Planning Inspectorate issued written advice to the applicant on 16 July 2026 requesting for: • evidence within the submitted application in relation to duties under s46 and s48 of the PA2008 to be provided as an appendix to any engagement summary document that the applicant may choose to submit or, where the applicant chooses not to submit such a document, as a discrete document titled 'Section 46 and section 48 information' • evidence within the submitted application in relation to new s55(4)(e) of the PA2008 to be provided in a submission version of this expanded advice log template	
Advice date: 31 July 2026		

Topic	s51 advice given	Applicant regard to s51 advice given
Draft document review feedback	Draft document feedback has been provided to the applicant, and this is available on the Find a National Infrastructure Project website, and this can be viewed at: View draft document review feedback	
Advice Given: 18 September 2026		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Email advice around the process of the application submission	Applications are now submitted through the DCO submission portal rather than via a standalone SharePoint submission site. You are correct that individual files must be less than 250MB and that the total size of uploaded files through the portal must be less than 1GB. Where an application is expected to exceed the 1GB limit, please discuss this with the case team as early as possible so that appropriate arrangements can be considered. Once the applicant admin user has been set up and provided with access to the portal, the applicant can begin uploading documents and completing the application form. Documents may therefore be uploaded in advance of the confirmed	

	submission date. However, the application itself cannot be submitted until the agreed submission date, when the "Submit" button becomes available. Yes, it is possible to bulk upload. Please be mindful of the maximum upload capacity outlined above. Once the application has been submitted through the portal using the Submit button, the application enters the acceptance stage. There is no separate requirement within the portal process to notify PINS that documents have been uploaded before submission. However, a covering email on the day of submission would be helpful. The fee to accompany the application and any outstanding fees must be paid when the NSIP application is submitted. The Planning Inspectorate does not raise an invoice for the application fee and will not consider the application until payment is received.	
Meeting date: 29 September 2026		
Topic	**s51 advice given**	**Applicant regard to s51 advice given**
Draft DCO Documents	The applicant explained that it is seeking a degree of flexibility within the proposed work	

	plans to respond to the complexity of the infrastructure. The Inspectorate advised the applicant to ensure that the extent and justification for any Limits of Deviation are clearly set out within the draft DCO and supporting plans. It noted that a robust explanation should be provided to demonstrate why the proposed flexibility is required and how it would operate in practice. The Inspectorate further advised the applicant to carefully consider the relationship between the proposed Limits of Deviation and any powers of Compulsory Acquisition. It noted that where land is proposed to be acquired to accommodate potential deviations in the location of works, the applicant should clearly justify the extent of land sought and explain why acquisition of the full area is necessary, should the final alignment or location of infrastructure change.	
DCO Submission Arrangements	The Inspectorate advised the applicant that, once a submission date is confirmed, a pre-submission notification letter would typically be issued approximately four weeks in advance of the final submission date. It noted that this correspondence would	

	include a link to the applicant's submission portal. The Inspectorate advised the applicant that delays to the anticipated submission programme may have implications for pre-application activities and associated resourcing. It noted that, should submission move into December 2026, consideration may need to be given to extending the programme beyond the Christmas period to account for holiday absences and resource constraints. The Inspectorate advised the applicant that an acceptance-stage shapefile would be required in advance of submission to support the application acceptance process. The applicant queried when the acceptance-stage shapefile should be provided to the Inspectorate. The Inspectorate advised that the shapefile should be submitted as early as possible and a minimum of two weeks prior to submission, where the applicant is satisfied that no substantive changes to its extent or content are anticipated. The Inspectorate advised the applicant that the submission portal permits uploads of up to 1GB in any single upload batch, rather than an overall file size restriction. It further advised the applicant to have regard to the	

	accessibility of application documents and to seek, where possible, to minimise file sizes to facilitate downloading and review by Interested Parties. The Inspectorate advised the applicant to undertake a test upload in advance of submission to ensure that any technical issues with the portal are identified and resolved prior to the submission date. The Inspectorate advised the applicant to consider the provision of hard-copy documentation for local communities and stakeholders who may have limited access to digital materials. It noted that the Planning Inspectorate does not require hard copies of application documents.	
Issues Tracker and PMIEs	The Inspectorate advised the applicant to ensure that the Biodiversity Net Gain (BNG) metric calculations, associated boundaries and supporting plans are sufficiently developed and clearly defined in advance of submission. It noted that BNG will be a significant component of the application and that, given the evolving nature of the requirements, clear and comprehensive information will be important to support understanding and assessment of the proposals.	

	The Inspectorate advised the applicant to engage closely with the relevant Local Planning Authorities in relation to the development of the BNG strategy. It noted that the authorities are likely to be affected by the proposed approach and should therefore be appropriately involved in discussions as the BNG proposals continue to be refined.	
Programme Lookahead & AOB	The applicant explained that, due to the complexity of the scheme, a number of the application plans are likely to be produced at a larger scale than that typically envisaged by the Planning Inspectorate's guidance. It noted that the increased scale is necessary to ensure the plans clearly and accurately present the proposed infrastructure and associated land requirements. The Inspectorate advised the applicant that the use of plans at a larger scale than set out in guidance may be acceptable where this is justified by the nature of the proposals. It noted that a clear explanation of the reasoning should be provided within the application documents and suggested that this may be appropriately addressed within the Guide to the Application or equivalent supporting documentation. The Inspectorate advised the applicant to begin considering potential venues that	

	could be used to accommodate hearings during the examination. It noted that factors such as venue capacity, suitability and availability should be taken into account and recommended that at least two potential venues are identified and assessed in readiness for examination, based on the applicants present timeline for submission of their DCO application. The Inspectorate advised the applicant that the venue requirement document would be issued alongside the pre-submission notification letter. It noted that this correspondence would provide further information regarding venue expectations and assist the applicant in preparing for the examination stage.	
Post-meeting note	The Inspectorate would advise the applicant, that when a Land Rights Tracker is submitted in support of the application documents, that the applicant redact any monetary values from the tracker and/or delete any tabs which reflect monetary values of land. This includes possibly redacting Affected Person or named parties associated to the land/agreements made and/or costs associated to plots.	

White Horse Reservoir – Log of s51 advice given to others		
Person s51 advice given to	**s51 advice given**	**Applicant regard to s51 advice given**
Sally Whiteman	See advice given here.	
Chris Stone	See advice given here.	
Chris Stone	See advice given here.	